

Message

From: Dorsey, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C8FB911FE64A49F193CCCF238D1A9328-DORSEY, NANCY]
Sent: 3/15/2021 7:50:02 PM
To: Holmstead, Jeff [jeff.holmstead@bracewell.com]; Johnson, Ken-E [Johnson.Ken-E@epa.gov]
CC: 'Ross Andrews' [randrews@gcscarbon.com]; 'Pete Jackson' [pjackson@gcscarbon.com]; Stephen Lee [Stephen.Lee@la.gov]; Corey Shircliff [Corey.Shircliff@la.gov]; Ussery, Ian [Ussery.Ian@epa.gov]; Yun, Samuel [Yun.Samuel@epa.gov]; Fontenot, Brian [Fontenot.Brian@epa.gov]; Benjamin Heard [bheard@gcscarbon.com]
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Hi Jeff,

No questions and no worries, we will not share anything outside the agency without express permission and inside only if they have CBI training or the equivalent.

Regards,
Nancy

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UIC Webpages:

<https://www.epa.gov/uic>

<http://www.epa.gov/uic/underground-injection-control-epa-region-6-ar-la-nm-ok-and-tx>

<http://www.epa.gov/uic/guidance-documents-completing-class-i-injection-well-no-migration-petitions>

Managing and Minimizing Potential of Injection-Induced Seismicity from Class II Disposal: Practical Approaches: <http://www.epa.gov/uic/underground-injection-control-national-technical-workgroup-final-issue-papers>

Monitoring Injection Wells—Basic Hall integral Method:

https://www.iris.edu/hq/inclass/animation/monitoring_injection_wellsbasic_hall_integral_method

From: Holmstead, Jeff <jeff.holmstead@bracewell.com>
Sent: Monday, March 15, 2021 2:47 PM
To: Dorsey, Nancy <Dorsey.Nancy@epa.gov>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; Stephen Lee <Stephen.Lee@la.gov>; Corey Shircliff <Corey.Shircliff@la.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Fontenot, Brian <Fontenot.Brian@epa.gov>; Benjamin Heard <bheard@gcscarbon.com>
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Nancy,

Just wanted to reinforce something we discussed on our last call. We are working with Louisiana Counsel to ensure that LDNR is subject to the same CBI protection requirements as EPA. Once we get this figured out, we'll be happy to have EPA share our CBI with LDNR. Until then, though, we again ask that you do not share our CBI submittals with anyone outside EPA.

Please let me know if you have any questions.

Thanks,

Jeff Holmstead
On behalf of GCS

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From: Benjamin Heard [<mailto:bheard@gcscarbon.com>]**Sent:** Monday, March 15, 2021 12:00 PM**To:** Johnson, Ken-E <Johnson.Ken-E@epa.gov>; Dorsey, Nancy <Dorsey.Nancy@epa.gov>**Cc:** 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; Holmstead, Jeff <jeff.holmstead@bracewell.com>; Stephen Lee <Stephen.Lee@la.gov>; Corey Shircliff <Corey.Shircliff@la.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Fontenot, Brian <Fontenot.Brian@epa.gov>**Subject:** Re: GCS CBI Submittal - Class VI Project Summary

Nancy,

Thanks for the note. There are several issues obviously in your note.

For a little clarity on what we will be filing over the next several weeks. We will be submitting the Project Narrative in about two weeks. The delay there is due to a desire to complete the well construction section. In that submittal we will be sending the Plugging Report as well to the Project Summary.

Further we will be submitting an updated AoR to the module this week which will include the Corrective Action Plan. I am not sure what an AoR action plan is however.

After the next 2 weeks all materials, except Pre-Operational Testing and Financial Assurance will be delivered.

Happy to connect via Teams to review the timing of reports as well as the other issues you discussed (CBI and PISC). Please let us know some times next week which might work for EPA.

Many thanks.

Sent via the Samsung Galaxy S8, an AT&T 5G Evolution capable smartphone
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From: Dorsey, Nancy <Dorsey.Nancy@epa.gov>
Sent: Monday, March 15, 2021, 9:38 AM
To: bheard@gcscarbon.com; Johnson, Ken-E
Cc: 'Ross Andrews'; 'Pete Jackson'; 'Holmstead, Jeff'; Stephen Lee; Corey Shircliff; Ussery, Ian; Yun, Samuel; Fontenot, Brian
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Thanks Ben.

After our earlier discussions on how information could be supplemented later in a Class VI application, we have looked more closely at the set-up and the information requirements. There apparently isn't an easy way to do modifications within the system particularly for the Project Information and AoR Review. We do need the basic geologic background before we can do anything. According to regulations, we are supposed to verify applications are complete before beginning the review.

With anticipated workloads getting a jump start could be useful if a method to avoid repeating the same thing can be devised. For example, using either the CBI folder to discuss interim points back and forth, or arrange controlled Teams meetings? Perhaps we should set up a short call to discuss possible processes, including LDNR?

A unofficial few notes on your most recent submissions:

For redaction in the pdfs, is there a way either "CBI" or "CBI + why" can be labelled over the black boxes? Alternatively could you add an explanation on an additional page, close to the front of the document? There are two or three standing FOIA's for everything submitted.

The Project Plan should not actually have accepted your submission without the AOR Action plan.

I noticed the alternative PISC is only one page, and the required PISC Project Plan has been relabeled as alternative. This appears to assume only one report will work and that for your proposed alternative plan. We are discussing this with HQ, but our initial reaction is the requirement was not properly understood, those are two separate requirements with overlapping information. We will get back with you on that. But the PISC plan is as much about procedures as results and is separate from a plan dropped from 50 years to 10.

Regards,
Nancy

From: bheard@gcscarbon.com <bheard@gcscarbon.com>
Sent: Saturday, March 13, 2021 8:13 AM
To: Dorsey, Nancy <Dorsey.Nancy@epa.gov>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>
Subject: GCS CBI Submittal - Class VI Project Summary

Ken and Nancy,

I wanted to let you know that last night GCS submitted an update to its Class VI permit for Project Minerva. We have submitted Project Summaries for each of the

1. Testing & Monitoring Program
2. Alternative PISC and
3. Emergency and Remedial Response Plan.

Please let us know if you have any questions. We trust you are having a good weekend. All the best.



BENJAMIN HEARD
Principal

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